

Ackerman, Joyce

From: Stovall - CDPHE, Curtis <curtis.stovall@state.co.us>
Sent: Tuesday, May 8, 2018 11:51 AM
To: Dave Folkes
Cc: Patrick Medland; Ackerman, Joyce; Jonathan H. Steeler; Myers, Craig; Sandusky, Eric; rdean@stratuscompanies.com; Piggott, Amelia; Walker - CDPHE, David; jason.king@coag.gov
Subject: Re: Phase 2A backfill

Hi Dave,

Yes, we concur with EPA that it is acceptable to backfill the Phase 1 and 2A excavations following the surveying. As we discussed, alternative form(s) of groundwater treatment will likely be necessary in and around the Phase 2A pit area and to the south in the area around MW-16, and potentially in other areas. Treatment options will be evaluated during the CMS process.

Thanks,
Curt

On Tue, May 8, 2018 at 10:55 AM, Dave Folkes <DFolkes@geosyntec.com> wrote:

Hi Curt,

Further to our phone call this morning, I understand that CDPHE agrees that the Phase 2A pit (as well as the Phase 1 pit) can now be backfilled without a gravel layer, given the low permeability exhibited by the final excavation surface. Confirmation samples will be collected and the final excavation grades will be surveyed, prior to backfilling.

Please let me know if you agree.

Best regards,

Dave

From: Stovall - CDPHE, Curtis <curtis.stovall@state.co.us>
Sent: Thursday, May 3, 2018 8:29 AM
To: Ackerman, Joyce <Ackerman.Joyce@epa.gov>
Cc: Patrick Medland <PMedland@Geosyntec.com>; Dave Folkes <DFolkes@Geosyntec.com>; Jonathan H. Steeler <JSteeler@sennlaw.com>; Sandusky, Eric <Eric.Sandusky@westonsolutions.com>; rdean@stratuscompanies.com; Piggott, Amelia <Piggott.Amelia@epa.gov>; Walker - CDPHE, David <david.walker@state.co.us>
Subject: Re: 4-26 Meeting

Patrick,

Contamination from drum disposal in the 2A area has moved to the south as evidenced by the fairly high levels of groundwater contamination at MW-16. CDPHE believes that the 2A excavation would be a prime location for future oxidant and substrate injections via a gravel layer similar to 2B. Therefore, I think we should have some discussions before the excavation is backfilled. Unfortunately, I'll be getting on an airplane in a few minutes and will be out of the office until next Tuesday. My schedule is open next Tuesday. I think my access to the internet will be very limited at best for the next five days. Thanks in advance for your consideration.

Thanks,

Curt

On Wed, May 2, 2018 at 6:08 PM, Ackerman, Joyce <Ackerman.Joyce@epa.gov> wrote:

Hi Patrick- as I recall, you stated that 2a had been excavated per the Work Plan until PID readings were below 100 ppm. Therefore, it is acceptable to EPA to backfill 2a.

Thanks!

Joyce Ackerman

Sent from my iPhone

On May 2, 2018, at 3:36 PM, Patrick Medland <PMedland@Geosyntec.com> wrote:

Joyce and Curt,

I would like to touch base regarding the backfill activities of Phase 2A. Per the email and approval below, it is my understanding that EPA agrees that Stratus can backfill the Phase 2A excavation. Our current schedule includes starting the backfill of this excavation Friday, May 4. Before any clean soils actually go back in, I want to double check that this is acceptable.

Please note that confirmation samples have been collected in Phase 2A and will be analyzed for total VOCs, SVOCs (including 1,4-dioxane), and RCRA metals but analytical data has not yet been released by the lab.

Relatedly, the data from the 8 Phase 2A stockpiles is slated to be sent from the lab tomorrow. As discussed, Eric will be the main point of contact for determinations about this soil while Joyce is on vacation. (Have a great vacation!)

Thanks,

Patrick

Patrick Medland

Scientist

Geosyntec Consultants

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From: Ackerman, Joyce <Ackerman.Joyce@epa.gov>

Sent: Thursday, April 26, 2018 10:55 AM

To: Patrick Medland <PMedland@Geosyntec.com>

Cc: Stovall - CDPHE, Curtis <curtis.stovall@state.co.us>; Dave Folkes <DFolkes@Geosyntec.com>; Jonathan H. Steeler <JSteeler@sennlaw.com>; Sandusky, Eric

<Eric.Sandusky@WestonSolutions.com>; rdean@stratuscompanies.com; Piggott, Amelia <Piggott.Amelia@epa.gov>

Subject: RE: 4-26 Meeting

Dear Patrick – EPA agrees with the proposed plan for the activities described below.

As we discussed today, if there are significantly different conditions encountered in the field, the plan may be altered after consultation with EPA. The goal of the soil removal in the Phase 1 area is to protect groundwater by removal of the mass of contaminants of concern in an efficient, practicable, and safe manner.

Thank you for your assistance.

Joyce

Joyce Ackerman

On-Scene Coordinator and START P.O.

U.S. EPA Region 8

1595 Wynkoop Street

Denver, CO 80202

(303) 312-6822

From: Patrick Medland [<mailto:PMedland@Geosyntec.com>]

Sent: Thursday, April 26, 2018 9:12 AM

To: Ackerman, Joyce <Ackerman.Joyce@epa.gov>

Cc: Stovall - CDPHE, Curtis <curtis.stovall@state.co.us>; Dave Folkes <DFolkes@Geosyntec.com>;

Jonathan H. Steeler <JSteeler@sennlaw.com>; Sandusky, Eric

<Eric.Sandusky@WestonSolutions.com>; rdean@stratuscompanies.com

Subject: 4-26 Meeting

Joyce,

Below are my notes from today's meeting with proposed actions (namely setting of depth). Please let me know if you approve or have other items to add. We will start excavation in Phase 1 this morning in Excavation Zone 3 based on my understanding of our meeting. I did not add in proposed confirmation samples to use for the floor, as that will be determined based on actual excavation

depths. Again, thanks for meeting me out at the site this morning and getting the work rolling. I very much appreciate it.

4/26/2018

Meeting with EPA

Phase 1 Excavation

- Zone 3 – the expected depth of excavation is approximately 4 feet below floor (fbf) – EPA and Stratus agrees to a maximum of 5 fbf
- Zone 2 – the expected depth of excavation is approximately 8-10 fbf – EPA and Stratus agrees to a maximum of 10 fbf unless there is an obvious hot spot. Excavate a little deeper, screen with PID, and backfill with clean fill
- Zone 1 - the expected depth of excavation is approximately 8-10 fbf – EPA and Stratus agrees to a maximum of 10 fbf unless there is an obvious hot spot. Excavate a little deeper, screen with PID, and backfill with clean fill
- Excavation will end at bedrock or if soils screen below 100 ppm.

Phase 1-SP1 Stockpile

- EPA and Stratus agree, due to low hits of PID while segregating in SE corner of the stockpile, currently no soil needs to be removed from the site.
- EPA and Stratus agree that some additional field screening will take place prior to backfill to determine if there are hot spots that will need to be removed from the site.

Phase 2A Excavation

- EPA observed the excavation and will determine if 8 stockpiles can be used as backfill or need to be disposed based on analytical data.
- EPA stated that Phase 2A can be backfilled with clean soils as appropriate.

Patrick

Patrick Medland

Scientist

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